

1 Vanessa R. Waldref  
2 United States Attorney  
3 Eastern District of Washington  
4 Michael D. Murphy  
5 Assistant United States Attorney  
6 402 E. Yakima Ave., Suite 210  
7 Yakima, WA 98901  
8 Telephone: (509) 454-4425

FILED IN THE U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

AUG 09 2022

SEAN F. MCAVOY, CLERK  
DEPUTY  
YAKIMA, WASHINGTON

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

9 UNITED STATES OF AMERICA,  
10

11 Plaintiff,

12 v.  
13

14 JEREMIAH BOBB,

15 Defendant.  
16

SUPERSEDING INDICTMENT

1:21-CR-02005-SMJ-1

Vio: 18 U.S.C. §§ 1153, 2243(a)  
Sexual Abuse of a Minor  
(Count 1)

18 U.S.C. §§ 1153, 2241(c)  
Aggravated Sexual Abuse of a  
Child  
(Count 2)

18 U.S.C. § 2253  
Forfeiture Allegations

21 The Grand Jury charges:  
22

23 COUNT 1

24 Between on or about February 1, 2017, and July 21, 2017, within the  
25 external boundaries of the Yakama Nation Indian Reservation, in Indian Country,  
26 in the Eastern District of Washington, the Defendant, JEREMIAH BOBB, an  
27 Indian, did knowingly cause Minor 1 to engage in a sexual act, to wit: the  
28

SUPERSEDING INDICTMENT – 1

1 intentional touching, not through the clothing, of the genitalia of Minor 1, who had  
2 attained the age of 12 years but had not attained the age of 16 years and was at  
3 least four years younger than the Defendant, with an intent to abuse, humiliate,  
4 harass, degrade, arouse and gratify the sexual desire of any person, in violation of  
5 18 U.S.C. §§ 1153, 2243(a).  
6  
7

8 COUNT 2

9  
10 Between on or about February 1, 2016, and October 24, 2017, within the  
11 external boundaries of the Yakama Nation Indian Reservation, in Indian Country,  
12 in the Eastern District of Washington, the Defendant, JEREMIAH BOBB, an  
13 Indian, did knowingly cause and attempt to cause Minor 2, a child who had not  
14 attained the age of 12 years to engage in a sexual act, to wit: the intentional  
15 touching, not through the clothing, of the genitalia of Minor 2, with an intent to  
16 abuse, humiliate, harass, degrade, arouse and gratify the sexual desire of any  
17 person, in violation of 18 U.S.C. §§ 1153, 2241(c).  
18  
19  
20

21 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

22 The allegations contained in this Indictment are hereby realleged and  
23 incorporated by reference for the purpose of alleging forfeitures.  
24

25 Pursuant to 18 U.S.C. § 2253(a), upon conviction of an offense in violation  
26 of 18 U.S.C. § 2241 or 2243 as set forth in Count 1 or Count 2 of this Indictment,  
27 the Defendant, JEREMIAH BOBB, shall forfeit to the United States any visual  
28

1 depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this  
2 chapter, or any book, magazine, periodical, film, videotape, or other matter which  
3 contains any such visual depiction, which was produced, transported, mailed,  
4 shipped or received in violation of this chapter; any property, real or personal,  
5 constituting or traceable to gross profits or other proceeds obtained from such  
6 offenses; and, any property, real or personal, used or intended to be used to commit  
7 or to promote the commission of such offenses, or any property traceable to such  
8 property.  
9

12 If any such property, as a result of any act or omission of the

13 Defendant:

- 14
- 15 a. cannot be located upon the exercise of due diligence;
  - 16 b. has been transferred or sold to, or deposited with, a third party;
  - 17 c. has been placed beyond the jurisdiction of the Court;
  - 18 d. has been substantially diminished in value; or
  - 19 e. has been commingled with other property which cannot be
  - 20 divided without difficulty,
  - 21
  - 22
  - 23
  - 24
  - 25
  - 26
  - 27
  - 28

1 the United States of America shall be entitled to forfeiture of substitute property  
2 pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).  
3

4 DATED this 9<sup>th</sup> day of August, 2022.  
5

6 A TRUE BILL

7  
8 Foreperson  
9

10 Vanessa R. Waldref  
11 Vanessa R. Waldref  
12 United States Attorney

13 Michael D. Murphy  
14 Michael D. Murphy  
15 Assistant United States Attorney  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28